

Exhibit 16

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June 5, 2014

VIA FEDERAL EXPRESS

Brenda S. Hamilton, Clerk
Circuit Court for the City of Roanoke
315 Church Avenue, S.W.
Courthouse - 3rd Floor
Roanoke, Virginia 24016

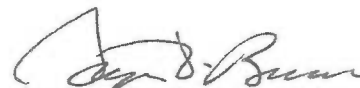
**Re: *Barbara J. Filson v. Insight Health Corp., et al.*
Circuit Court for the City of Roanoke
CL12-2575**

Dear Ms. Hamilton:

I enclose a Notice of Removal and Transfer Pursuant to 28 U.S.C. § 157(b)(5) for filing with the other papers in this matter. I enclose an extra copy of the Notice, and would ask that you date stamp this copy and return it to me in the self-addressed envelope.

Thank you for your courtesy and cooperation.

Sincerely,


Stephen D. Busch

SDB/tjp
Enclosures

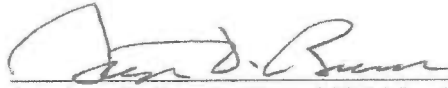
cc: J. Scott Sexton, Esquire (via e-mail and First Class Mail)
John T. Jessee, Esquire (via e-mail and First Class Mail)

From the Circuit Court for the City of Roanoke, Virginia
To the United States District Court for the District of Massachusetts

Respectfully submitted,

INSIGHT HEALTH CORP.

BY COUNSEL



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Attorneys for Defendant Insight Health Corp.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Notice of Removal and Transfer Pursuant to 28 U.S.C. § 157(b)(5) was served on the following via First Class U.S. Mail and via electronic mail on this 5th day of June, 2014:

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Counsel for Defendants,
Image Guided Pain Management, P.C.;
Robert F. O'Brien, M.D.; and
John M. Mathis, M.D.

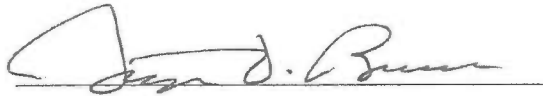
A handwritten signature in black ink, appearing to read "John M. Mathis", is written over a horizontal line.

EXHIBIT A

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UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

MDL NO. 13-02419-RWZ

IN RE: NEW ENGLAND COMPOUNDING PHARMACY, INC.
PRODUCTS LIABILITY LITIGATION

ORDER

June 5, 2014

ZOBEL, D.J.

Upon consideration of the Chapter 11 Trustee's renewed and supplemental motion (the "Motion") to transfer to this court additional personal injury tort and wrongful death cases pursuant to 28 U.S.C. §§ 157(b)(5) and 1334 (Docket # 732), and the memorandum in support thereof, the court found that notice of the Motion is proper and the relief requested in the Motion is in the best interests of the debtor, its estate, creditors, claimants, and other parties-in-interest. After due deliberation and sufficient cause appearing thereof, and for the reasons set forth in this court's memorandum of decision (Docket # 1131) dated May 15, 2014, the court allowed the Motion.

Accordingly, it is hereby

1. **ORDERED** that, pursuant to 28 U.S.C. § 157(b)(5), the personal injury and wrongful death cases identified on Exhibit A attached hereto (the "Pending Actions") are removed and transferred to this court from the Roanoke City Circuit Court in which they are currently pending; and it is further

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2. **ORDERED** that a Notice of Removal and Transfer, pursuant to 28 U.S.C. § 157(b)(5), of each of the Pending Actions, in the form of Exhibit B hereto, and a copy of this Order shall be filed in the Roanoke City Circuit Court and provided to all parties-in-interest in each of the Pending Actions; and it is further
3. **ORDERED** that, pursuant to 28 U.S.C. § 157(b)(5), the clerk of the Roanoke City Circuit Court shall thereafter promptly transfer the case file pertaining to each Pending Action to the clerk of the District Court for the District of Massachusetts; and it is further
4. **ORDERED** that plaintiffs, defendants, and their counsel shall promptly take any and all actions necessary to effectuate the transfer of the Pending Actions pursuant to this Order; and it is further
5. **ORDERED** that this Order shall not modify or in any way affect the automatic stay that applies to the Pending Actions under 11 U.S.C. § 362 and which shall remain in full force and effect pending further order of this court or the bankruptcy court; and it is further
6. **ORDERED** that this Order is entered without prejudice to any position that the Trustee may take regarding whether 11 U.S.C. §§ 105 and 362 operate to stay any Pending Action or to render null and void the post-petition filing of any Pending Action.

June 5, 2014
DATE

/s/Rya W. Zobel
RYA W. ZOBEL
UNITED STATES DISTRICT JUDGE

EXHIBIT B

(Form of Notice of Removal and Transfer to be filed in the Roanoke City Circuit Court)

[APPROPRIATE CAPTION WITH PARTIES' NAMES AND CASE NUMBER]

NOTICE OF REMOVAL AND TRANSFER PURSUANT TO 28 U.S.C. § 157(b)(5)

In accordance with the Memorandum of Decision entered on May 15, 2014, and the Order entered on June 5, 2014, by the Honorable Rya W. Zobel, United States District Court for the District of Massachusetts, notice is hereby given as follows:

Pursuant to 28 U.S.C. § 157(b)(5), the entire court case file pertaining to this action shall be transferred from the Roanoke City Circuit Court to the clerk of the District of Massachusetts. A copy of the Order is attached as Exhibit A.

Dated: [DATE OF REMOVAL]
[LOCATION]

Respectfully submitted,

[REMOVING COUNSEL]

Attorneys for [REMOVING DEFENDANT]

EXHIBIT A

The following is a list of the Pending Actions transferred to the United States District Court for the District of Massachusetts, pursuant to 28 U.S.C. § 157(b)(5):

<u>Case</u>	<u>Docket No.</u>	<u>Filed</u>	<u>Court</u>
1. <i>Trudy R. Epperly v. Insight Health Corp., et al.</i>	CL12002571	12/28/2012	Roanoke City Circuit Court
2. <i>James Wirt Smith v. Insight Health Corp., et al.</i>	CL12002572	12/28/2012	Roanoke City Circuit Court
3. <i>Pauline R. McFarlane v. Insight Health Corp., et al.</i>	CL12002573	12/28/2012	Roanoke City Circuit Court
4. <i>Chester T. Kalinoski v. Insight Health Corp., et al.</i>	CL12002574	12/28/2012	Roanoke City Circuit Court
5. <i>Barbara J. Filson v. Insight Health Corp., et al.</i>	CL12002575	12/28/2012	Roanoke City Circuit Court
6. <i>Dana Marlene Bradley v. Insight Health Corp., et al.</i>	CL12002576	12/28/2012	Roanoke City Circuit Court
7. <i>Zachary Lucas Foutz, a Minor, by His Parents and Next Friends, Benjamin T. Foutz and Andrea L. Foutz v. Insight Health Corp., et al.</i>	CL13000009	1/2/2013	Roanoke City Circuit Court
8. <i>Richard A. Whitlow v. Insight Health Corp., et al.</i>	CL13000054	1/7/2013	Roanoke City Circuit Court
9. <i>Robert Earl Harris, Jr. v. Insight Health Corp., et al.</i>	CL13000055	1/7/2013	Roanoke City Circuit Court
10. <i>Randolph E. Smith v. Insight Health Corp., et al.</i>	CL13000057	1/8/2013	Roanoke City Circuit Court
11. <i>Julian Delano Holbrook v. Insight Health Corp., et al.</i>	CL13000370	2/11/2013	Roanoke City Circuit Court

<u>Case</u>	<u>Docket No.</u>	<u>Filed</u>	<u>Court</u>
12. Ronald T. Courtney v. Insight Health Corp., et al.	CL13000417	2/15/2013	Roanoke City Circuit Court
13. Ferman W. Wertz v. Alaurus Pharmaceutical, LLC, et al.	CL13000452	2/21/2013	Roanoke City Circuit Court
14. Patrick O. Johnston v. Alaurus Pharmaceutical, LLC, et al.	CL13000453	2/21/2013	Roanoke City Circuit Court
15. Ronald A. Brown v. Insight Health Corp., et al.	CL13000538	3/1/2013	Roanoke City Circuit Court
16. Robert Dana Bender, Executor of the Estate of Ralph James Irace, Jr., Deceased v. Insight Health Corp., et al.	CL13000577	3/6/2013	Roanoke City Circuit Court
17. Odessa M. Shuck v. Insight Health Corp., et al.	CL13000584	3/7/2013	Roanoke City Circuit Court
18. Rose M. White v. Insight Health Corp., et al.	CL13000606	3/8/2013	Roanoke City Circuit Court
19. Patricia S. Brown, et al. v. Insight Health Corp., et al.	CL13000607	3/8/2013	Roanoke City Circuit Court
20. Sandra F. Artis v. Insight Health Corp., et al.	CL13001105	5/10/2013	Roanoke City Circuit Court